

BILL LIETZKE
GENERAL DELIVERY
135 CATOMA STREET
MONTGOMERY, ALABAMA 36104

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MICHIGAN

BILL LIETZKE,
PLAINTIFF,

) VIOLATION OF FIRST AND FIFTH
AMENDMENT RIGHTS
)

VS.

CITY OF MONTGOMERY, ET AL,
KEVIN MURPHY,

Case: 2:17-cv-12921
Judge: Cohn, Avern
MJ: Stafford, Elizabeth A.
Filed: 08-28-2017 At 02:26 PM
CMP LIETZKE V MONTGOMERY, CITY OF ET AL (AT

DEFENDANTS.

1. Jurisdiction founded on the existence of a federal question and amount in controversy.

2. The action arises under the Constitution of the United States, Article III, Section II, as hereinafter more fully appears.

3. The amount in controversy exceeds, exclusive of interests and costs, the sum of \$1, 000,000,000. 00

4. About or around November 25, 2016, through agent City of Montgomery officers, the City of Montgomery, a black female officer and black male officer, detained the Plaintiff with lawful privilege on Madison Avenue in Montgomery and proceeded to demand personal and private information from the Plaintiff as to the Plaintiff's "ID," "social security number," "date of birth," and "name."


5. Thereafter, the City of Montgomery released the Plaintiff on his own recognizance on Madison Avenue and resumed patrol.

6. The City of Montgomery precipitated said actions without probable cause and without lawful privilege therefor, abridging the Plaintiff's right of the people peaceably to assemble under the First Amendment, and abridging the Plaintiff's right to plead the Fifth Amendment under the Constitution of the United States.

1 8. As a proximate consequence of the Defendants' acts, the Plaintiff suffered
2 (1) Violation of the Plaintiff's civil rights, (2) Plaintiff's mental anguish
3 (3) Intentional infliction of emotional distress.

4 WHEREFORE, the Plaintiff demands that judgment is entered against the Defendants,
5 and judgment for Compensatory Damages, Actual Damages, and Punitive Damages, in the
6 amount of \$1,000,000,000.00

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8 Submitting for filing this date August 21, 2017
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General Delivery
135 Catoma Street

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GENERAL DELIVERY
135 CATOMA STREET
MONTGOMERY, ALABAMA 36104

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MICHIGAN

| | |
|----------------------------|------------|
| BILL LIETZKE, |) CASE NO. |
| PLAINTIFF, |) |
| VS. |) |
| CITY OF MONTGOMERY, ET AL, |) |
| KEVIN MURPHY, |) |
| DEFENDANTS. |) |

PLAINTIFF'S FIRST SET OF INTERROGATORIES

Plaintiff Bill Lietzke demands Defendants City of Montgomery, Et Al Kevin Murphy to answer the following written Interrogatories and Complaint under oath and in accordance with Rule 33 of the Federal Rules of Civil Procedure. Defendants shall file written answers in the United States District Court, District of Michigan within 21 days after the filing of the Interrogatories and Complaint. Failure of Defendants to file written answers to the Interrogatories and Complaint within 21 days after the filing of the case constitutes contempt of court. District of Michigan enters DEFAULT JUDGMENT against Defendants and assesses fines for \$100,000,000.00, pursuant to Rule 55 of the Federal Rules of Civil Procedure. District of Michigan imposes prison sentence 10 years in Michigan's minimum security state prison. Interrogatories and Complaint shall be addressed to the Defendants, and all answers shall reflect the cumulative knowledge of the Defendants and any servants, agents, and employess thereof.

The Plaintiff demands the Defendants to produce and identify, specifically and in a form suitable for use in a subpoena, all original documents, original records, and all other written materials containing, setting forth, or in reference to the

1 information provided in answering the Interrogatories and Complaint. Defendants must
2 produce and identify original documents and records. Computer print outs of lists and
3 data and photocopies of documents and records are unacceptable.

4 1. What is the organizational structure of the State of Alabama Montgomery
5 Police Department for the following years: 2015, 2016, 2017, and 2018? Describe in
6 full detail the State of Alabama Montgomery Police Department's organizational
7 structure for the following: 2015, 2016, 2017, and 2018.

8 2. State the full legal names, the full legal residences, the races, the sexes,
9 the badge numbers, the position titles, and if applicable the promotions of the City
10 of Montgomery officers who unlawfully detained the Plaintiff on Montgomery public
11 street of Madison Avenue on November 25, 2016.

12 3. State with degree of specificity the actions that the Plaintiff was alleged
13 to have done that was the basis of the Plaintiff's unlawful detention on Madison Avenue
14 on November 25, 2016.

15 4. State the full legal names, the full legal residences, the races, the sexes,
16 the telephone numbers including area codes, and the places of employment of any
17 witnesses complaining of alleged actions of the Plaintiff, prior to the unlawful
18 detention of the Plaintiff on November 25, 2016, and state with a degree of specificity
19 the substance of said complaints.

20 5. State the full legal names, the full legal residences, the races, the sexes,
21 the telephone numbers including area codes, and the places of employment of any
22 witnesses that any Montgomery police officer interviewed pertaining to the alleged
23 actions of the Plaintiff on November 25, 2016, prior to the unlawful detention of the
24 Plaintiff, and state with a degree of specificity the substance of said complaints.

25 Submitting for filing this date August 21, 2017
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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

DEFENDANTS

COUNTY OF RESIDENCE IS MONTGOMERY

COUNTY OF RESIDENCE IS UNIDENTIFIED

(b) County of Residence of First Listed Plaintiff

County of Residence of First Listed Defendant

(EXCEPT IN U.S. PLAINTIFF CASES)

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|---------------------------------------|---------------------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input checked="" type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

| CONTRACT | PERSONAL INJURY | PERSONAL INJURY | FOREIGN TORTS | LABOR | LABOR | LABOR |
|---|--|--|--|--|--|---|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | <input checked="" type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes | <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) |
| <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act | <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | | <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions |

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

TITLE 28, UNITED STATES CODE, SECTION 1983

Brief description of cause:

LIBEL AND SLANDER, CIVIL RIGHTS VIOLATIONS

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

\$1,000,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

AUGUST 21, 2017

USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE



Label 107R, July 2013

SCANNED

New
case?

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Detroit, Michigan 48226



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